

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

**BERKSHIRE GAS COMPANY**

**D.T.E. 01-56**

ATTORNEY GENERAL'S TWELFTH SET OF  
DOCUMENT AND INFORMATION REQUESTS

The following is the Attorney General's TWELFTH SET of information requests in the above referenced docket to be answered according to the instructions already issued by the Attorney General.

- AG-12-1      Please provide a complete description of each Berkshire supply, transportation, storage and peaking resource (including, but not limited to capacity, number of days supply, type of service, receipt and delivery points, and demand and commodity charges and price provisions).
- AG-12-2      Please specify the termination date of each Berkshire gas supply, storage and transportation contract included in the calculation of the MBA in Schedule JLH-3.
- AG-12-3      Regarding Schedule JLH-3, p. 7, please provide the following:
- A)      Identify each pipeline and "other" resource included in the total capacity of 61,764 MCF.
  - B)      Specify the MDQ assumed for each pipeline and "other" resource that is included in the total capacity of 61,764 MCF.
  - C)      Specify the demand costs assumed for each pipeline and "other" resource included in the grand total of \$5,998,972.
  - D)      Provide the basis of the demand costs assumed for each resource, including work-papers.

E) Specify and provide the basis of the capacity and demand cost of the new LNG supply facility that is included in the calculation.

F) Identify each resource included in the pipeline category.

AG-12-4 For each Berkshire resource, please provide the actual monthly average commodity cost per Mcf, by month from January 2000 to the present.

AG-12-5 For each Berkshire resource, please provide the actual monthly demand charges, by month from January 2000 to the present.

AG-12-6 For each Berkshire resource, please supply the actual monthly volumes for each month in 2000.

AG-12-7 Please document the following steps in the allocation of capacity costs, as described in the Harrison testimony on page 11:

A) the inputs and results of the Company's daily dispatching model that Mr. Harrison has employed,

B) the monthly tabulation of the results of the daily dispatching model, and

C) the determination of the "pipeline charges required for summer storage injections."

AG-12-8 Please provide an illustrative calculation of the allocation of monthly capacity costs to customer classes "in proportion to monthly usage, after deducting load served by the high load factor block," Harrison testimony, p. 11.

AG-12-9 Regarding schedule JLH-3, for the resources assigned to the base use block in the allocation of commodity costs, please provide the following information, for each resource *separately*:

A) identify each resource,

B) provide the demand charge per MCF and commodity charge per MCF assumed for that resource,

C) provide the total demand costs for that resource assigned to the base

use block,

- D) provide the total commodity costs for that resource assigned to the base use block,
- E) provide the sendout from that resource assumed in the assignment of the costs of that resource to the base use block,
- F) provide the sendout from that resource resulting from the daily dispatch model,
- G) provide the total commodity costs for that resource resulting from the daily dispatch model,
- H) explain the basis for the sendout and the commodity costs of that resource assigned to the base use block, if those values differ from the results of the dispatch model.

AG-12-10      Regarding schedule JLH-3, for the pipeline and other resources assigned to the “remaining load” in the allocation of commodity costs, please provide the following information, for each resource *separately*:

- A) identify each resource,
- B) provide the demand charge per MCF and commodity charge per MCF assumed for that resource,
- C) provide the total demand costs for that resource assigned to the base use block,
- D) provide the total commodity costs for that resource assigned to the base use block,
- E) provide the sendout from that resource assumed in the assignment of the costs of that resource to the base use block,
- F) provide the sendout from that resource resulting from the daily dispatch model,
- G) provide the total commodity costs for that resource resulting from the

daily dispatch model,

- H) explain the basis for the sendout and the commodity costs of that resource assigned to the base use block, if those values differ from the results of the dispatch model.

AG-12-11      Schedule JLH-3, pp. 6: Regarding the assignment of variable costs to interruptibles, please provide the following information:

- A) document the basis for the assignment, including all workpapers,
- B) identify each resource assumed to supply interruptible loads, and for each resource, *separately*, provide:
  - 1) the sendout from that resource assumed in the assignment of the costs of that resource to interruptibles,
  - 2) the commodity charge per Ccf assumed for that resource,
  - 3) the total commodity costs for that resource assigned to interruptibles,
  - 4) the basis for assigning that resource to interruptible loads.

AG-12-12      Regarding schedule JLH-3, p. 6 on storage withdrawals, please provide:

- A) the basis of the total monthly withdrawal costs;
- B) the basis of the withdrawal costs per Ccf in each month;
- C) the basis of the monthly withdrawal volumes assumed; and
- D) all analyses, data used, dispatch model inputs and results, and supporting workpapers.

AG-12-13      Regarding schedule JLH-3, p. 6 on storage injections, please provide:

- A) the basis of the total monthly injection costs;
- B) the basis of the injection costs per Ccf in each month;

- C) the basis of the monthly injection volumes assumed; and
- D) all analyses, data used, dispatch model inputs and results, and supporting workpapers.

AG-12-14 Regarding the assignment of variable costs to storage refill, please identify each resource assumed to be used to fill storage, and for each resource, *separately*, provide:

- A) the monthly sendout of this resource injected to storage,
- B) the variable cost per Ccf assumed for that resource,
- C) the monthly demand charge of that resource;
- E) the total monthly variable cost of that resource assigned to storage injections, and
- F) the basis for assigning that resource to storage injection.

AG-12-15 Regarding the assignment of LNG boiloff in the MBA calculation, please provide the following information:

- A) the assignment of LNG boiloff to base use versus remaining load, including all workpapers;
- B) the assignment of LNG boiloff to month, including all workpapers; and
- C) the variable cost per Ccf assumed for LNG boiloff and the basis for this assumption.

AG-12-16 Please identify and explain (with reference to the MBA workpapers) the elements of the calculation of the MBA allocator and CGAC factors that reflect the new LNG facility.

AG-12-17 Please provide all cost-benefit analyses of the new LNG facility prepared by or for the Company.

AG-12-18 Regarding Allesio testimony, p. 11, please provide all analyses and internal memoranda on the Company's decision to delay the completion of the LNG facility.

- AG-12-19      Regarding Alleccio testimony p. 11, please provide all analyses and internal memoranda on the Company's decision to commission this plant in early 2000.
- AG-12-20      Regarding Alleccio testimony p. 11, please quantify the benefits to customers from the delay of the LNG facility and include all workpapers.
- AG-12-21      Regarding Normand testimony, p. 8, please explain in detail, including all analyses, reports, internal memoranda, and workpapers, how the new LNG facility "changes the role of existing propane facilities in a portion of the Company's service territory."
- AG-12-22      Regarding Normand testimony, p. 8, please provide the capacity of the existing propane facilities whose role is changed as a result of the new LNG facility.
- AG-12-23      Regarding Normand testimony, p. 7 on the allocation of propane storage tanks between utility and non-utility operations, please provide:
- A)      the carrying charges on each of the Company's LPG vaporization and storage facilities;
  - B)      the LPG storage requirement, under the Company's planning design criteria, with the new LNG facility;
  - C)      the LPG storage requirement, under the Company's planning design criteria, without the new LNG facility;
  - D)      the required capacity of LPG vaporizing equipment, under the Company's planning design criteria, with the new LNG facility;
  - E)      the required capacity of LPG vaporizing equipment, under the Company's planning design criteria, with the new LNG facility; and
  - F)      Include all supporting workpapers.
- AG-12-24      Please explain how costs and benefits will be allocated among Energy East subsidiaries in the case of transactions that involve capacity and/or sendout from the Company's new LNG facility.
- A)      Include an illustrative calculation.
- AG-12-25      Please provide an electronic copy of all workpapers used to develop the Market Based

Allocation for Cost of Gas Factor, as presented in Schedule JLH-3 and Workpapers Supporting Schedule JLH-3.

- AG-12-26      Regarding schedule JLH-3, p. 8, please specify the allocation formula that results in an allocation of base demand costs to each rate class for each month.
- AG-12-27      Regarding schedule JLH-3, p. 10, please specify the allocation formula that results in an allocation of remaining demand costs to each rate class for each month.
- AG-12-28      Regarding Harrison testimony, p. 11, please provide an estimate of class peak day load consistent with the normal weather year loads employed by Mr. Harrison.
- AG-12-29      Please provide a copy of the attachment to the Company's response to Information Request AG-1-66 showing the history of the medical reserve balance.

Dated:              September 27, 2001